

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

LUIS C. DELAHOZ)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:15-cv-484
)	
THE HOME GUARDIAN TRUST,)	
SN SERVICING CORPORATION,)	
LENDERLIVE NETWORK, INC.)	
Defendants.)	

**DEFENDANT THE HOME GUARDIAN TRUST’S MOTION TO
COMPEL DISCOVERY RESPONSES FROM PLAINTIFF**

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Local Rule 37, Defendant, The Home Guardian Trust (“Defendant”), hereby moves the Court for an Order compelling Plaintiff, Luis Delahoz (“Plaintiff”) to serve answers to The Home Guardian Trust’s First Set of Interrogatories to Plaintiff and The Home Guardian Trust’s First Set of Requests for Production of Documents to Plaintiff. As grounds for this Motion, Defendant states:

1. Defendant served its First Set of Interrogatories and First Request for Production of Documents upon Plaintiff on or about January 14, 2016 (*see* Exhibits A and B attached hereto);
2. Plaintiff's Answers to Defendant's First Set of Interrogatories and First Request for Production of Documents were due to Defendant on or about February 15, 2016;
3. On or about February 16, 2016 Defendant, through counsel, sent a letter to Plaintiff's counsel in an attempt to confer in good faith, and to secure Plaintiff's

formal responses to the requests for discovery without court action (*See* Exhibit C attached hereto);

4. To date, Plaintiff has failed to object or otherwise respond to any of the Defendant's discovery requests.

WHEREFORE, The Home Guardian Trust requests that the Court order Plaintiff to serve its responses to Defendant's interrogatories and document production requests within twenty-one (21) days of allowing this motion.

Respectfully submitted,

By its attorneys

/s/Michael P. Robinson
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RULE 37 CERTIFICATION

I certify that I have made a good faith effort to confer with Plaintiff's counsel, Todd S. Dion, in an effort to secure the responses without the necessity of court action.

/s/Michael P. Robinson

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February 2016, that I have caused the within Motion to Compel to be filed with the Court via the ECF filing system. As such, this document will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants.

/s/Michael P. Robinson